

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:

Case No. HG 08-04472

EDWARD J. MOORE,

Chapter 7; Filed: 5/20/08

Debtor.

Honorable Jeffrey R. Hughes

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MOTION TO COMPEL TURNOVER

NOW COMES Chapter 7 Trustee Jeff A. Moyer (“Trustee”), by and through his attorneys, The Bankruptcy Group, Inc., and states as his Motion to Compel Turnover to the Court the following:

1. On May 20, 2008, Edward J. Moore (“Debtor” or “Moore”) filed a voluntary Chapter 7 petition for relief under the Bankruptcy Code.
2. Jeff A. Moyer (“Trustee” or “Movant”) is the duly-appointed, qualified and acting Chapter 7 Trustee in this case.
3. The Trustee has requested turnover from Mr. Moore and his attorney the amount of \$918.80 representing the non-exempt portion of his 2008 IRS and State tax refunds on at least two separate occasions. The Trustee requests turnover of those tax refunds for the benefit of his bankruptcy creditors.
4. The personal property involved is not of inconsequential value nor without benefit to the estate.
5. Mr. Moore is required to turnover the funds in question to the Trustee and has failed to do so.

WHEREFORE, Trustee Jeff A. Moyer requests this Court to enter an Order granting the following relief:

A. Requiring the immediate turnover by Mr. Moore the amount of \$918.80 representing the non-exempt portion of his 2008 IRS and State tax refunds; and

B. Grant such other or further relief as this Court deems just and proper.

Respectfully submitted,

THE BANKRUPTCY GROUP, INC.
Attorneys for Trustee Jeff A. Moyer

Dated: October 4, 2011

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